

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

|                                   |   |                           |
|-----------------------------------|---|---------------------------|
|                                   | X |                           |
|                                   | : |                           |
| <i>In re</i>                      | : |                           |
|                                   | : | PROMESA                   |
| THE FINANCIAL OVERSIGHT AND       | : | Title III                 |
| MANAGEMENT BOARD FOR PUERTO RICO, | : |                           |
|                                   | : |                           |
| as representative of              | : | Case No. 17-BK-3283 (LTS) |
|                                   | : |                           |
| THE COMMONWEALTH OF PUERTO RICO,  | : | (Jointly Administered)    |
| <i>et al.</i> , <sup>1</sup>      | : |                           |
|                                   | : |                           |
| Debtors.                          | : |                           |
|                                   | : |                           |
|                                   | X |                           |

**MOTION FOR LEAVE TO FILE POSITION AS *AMICUS CURIAE* BY**  
**THE OFFICE OF THE COURTS ADMINISTRATION OF THE COMMONWEALTH**  
**OF PUERTO RICO**

**TO THE HONORABLE COURT:**

COMES NOW, the Office of the Courts Administration of the Commonwealth of Puerto Rico (the “OAT,” for its Spanish acronym), through the undersigned counsel, and respectfully request leave to file its position, as *amicus curiae*, in relation to the *Modified Eighth Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico* (Docket Entry No. 19365), as modified pursuant to any revisions made at or subsequent to the Confirmation Hearing as set forth in the Proposed Confirmation Order, including the Plan Supplement (the “Revised Proposed

<sup>1</sup> The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

Plan”), and the *Motion Submitting Corrected Response of the Financial Oversight and Management Board in Accordance with Order Regarding Certain Aspects of Motion For Confirmation of Modified Eight Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.* (Docket Entry No. 19574) (the “Corrected Response”), particularly, as it relates to the Judiciary Retirement System (the “JRS”).

1. On September 30, 2021, the Court granted the OAT’s request for leave to file an *Amicus Curiae* and Legal Brief. Docket Entry No. 18336.

2. On October 1, 2021, the OAT filed its *Amicus Curiae* and Legal Brief. Docket Entry No. 18359.

3. Some of the proposals and statements contained in the Revised Proposed Plan and the Corrected Response affect the JRS in ways that were not discussed in the *Amicus Curiae* and Legal Brief filed in October. Accordingly, the OAT requests leave to file its position as to those proposals and a term of seven days to file said position.

WHEREFORE, the OAT very respectfully requests that the Court allow it to submit its position as *amicus curiae* regarding the revised proposed JRS reform measures, and a term of seven days to file said position.

#### **CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED that on this date the foregoing was electronically filed with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the participants in said record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 28<sup>th</sup> day of December 2021.

**MCCONNELL VALDÉS LLC**  
*Attorneys for the OAT*  
270 Muñoz Rivera Avenue  
San Juan, Puerto Rico 00918  
P.O. Box 364225  
San Juan, Puerto Rico 00936-4225  
Tel: (787) 759-9292

Fax: (787) 759-8282

By: s/ Juan A. Marqués-Díaz  
Juan A. Marqués-Díaz  
USDC-PR No. 211803  
[jam@mcvpr.com](mailto:jam@mcvpr.com)

By: s/ Isabel Torres Sastre  
Isabel Torres Sastre  
USDC-PR No. 229114  
[its@mcvpr.com](mailto:its@mcvpr.com)